

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SYNQOR, INC.

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civ. No. 2:14-cv-00286-MHS-CMC

JURY TRIAL

CISCO'S DISCLOSURE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282, defendant Cisco Systems, Inc. ("Cisco") hereby provides notice at least thirty days before the trial, of the country, number, date, and name of the patentee of any patent, the title, date, and page numbers of any publication to be relied upon as anticipation of the patents in suit or as showing the state of the art, and the name and address of any person who may be relied upon as the prior inventor or as having prior knowledge of or as having previously used or offered for sale the purported invention of the patents in suit.

The entirety of each patent or publication is being relied upon as prior art unless otherwise stated.

I. PATENTS

COUNTRY	NUMBER	DATE	PATENTEE
United States	5,274,539	Dec. 28, 1993	Robert L. Steigerwald et al.
United States	5,377,090	Dec. 27, 1994	Robert L. Steigerwald

II. PUBLICATIONS

TITLE	PAGE NUMBERS	DATE	AUTHOR
A Distributed Power System with a Low-Cost Universal DC/DC Converter	Proc. 31st Int'l Conf. on Power Conversion Electronics, pp. 315–322	Sept. 1995	Douglas P. Arduini
Low Output Voltage DC/DC Conversion	Proc. 20th Int'l Conf. on Industrial Electronics, Control and Instrumentation (IECON '94), vol. 3, pp. 1676–81	Sept. 5–9, 1994	J.A. Cobos and J. Uceda
The Market for Distributed Power Systems	Proc. Sixth Annual Applied Power Electronics Conference and Exposition (APEC '91), pp. 225–29	March 10–15, 1991	Constance C. Heath
Design Considerations for Forward Converter with Synchronous Rectifiers	Virginia Power Electronics Center 1993 Power Electronics Seminar, pp. 163–73	Sept. 19–21, 1993	M.M. Jovanović et al.
Isolating the Control Loop	Proc. Power Supply Design Seminar (SEM-1000), Unitrode Corp.	1994	Robert Mammano
A High-Efficiency 1.5 kW, 390-50 V Half-Bridge Converter Operated at 100% Duty-Ratio	Proc. 7th Annual Conf. Applied Power Electronics Conference and Exposition (APEC '92), pp. 723–30	Feb. 23–27, 1992	L. Haachitaba Mweene et al.
How Many Isolated DC-DC's Do You Really Need?	Proc. 11th Annual Applied Power Electronics Conference and Exposition (APEC '96), vol. 2, pp. 692–95	March 3–7, 1996	Brian Narveson

TITLE	PAGE NUMBERS	DATE	AUTHOR
Comparison of GaAs and Silicon Synchronous Rectifiers in a 3.3V Out, 50W DC-DC Converter	Record 27th Annual Power Electronics Specialists Conference (PESC '96), vol. 1, pp. 861–67	June 23–27, 1996	Van A. Niemela and Wayne C. Bowman
Switching and Linear Power Supply, Power Converter Design	Hayden Book Company, Inc.	1977	Abraham I. Pressman

III. PERSONS WHOSE KNOWLEDGE DEFENDANTS MAY RELY UPON

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Subject to Cisco’s identification of prior art references (Feb. 14, 2014) and combinations of prior art references (June 27, 2014) submitted pursuant to the Court’s Order entered April 25, 2014 (Dkt No. 50), Cisco further incorporates by reference in their entirety: (i) expert reports submitted by Patrick L. Chapman, Ph.D. on behalf of Cisco in this case on April 11, 2014 (“Invalidity Expert Report”), April 23, 2014 (“First Supplemental Invalidity Expert Report”), May 7, 2014 (“Second Supplemental Invalidity Expert Report”) and May 19, 2014 (“Rebuttal Invalidity Expert Report”) (collectively, “Invalidity Expert Reports”), and May 9, 2014 (“Non-Infringement Expert Report”) and all exhibits thereto (collectively, “Expert Reports”); (ii) documents cited in the Expert Reports; (iii) invalidity contentions for each of the patents in suit submitted in the present action and in Civil Action No. 2:11-CV-54-DF; (iv) all prior art references cited or disclosed in the prosecution and/or reexamination of the patents in suit and/or listed on the face of each of the patents in suit; (v) any disclosures submitted under 35 U.S.C. § 282 by Defendant Vicor Corporation in Civil Action No. 2:14-CV-287; and (vi) Cisco’s identification of trial witnesses.

Cisco reserves the right to amend, modify or supplement this disclosure.

Dated: August 22, 2014

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 22, 2014.

/s/ Michael E. Jones